

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CORY L. BRACKBILL Debtor	:	CHAPTER 13
	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
CORY L. BRACKBILL	:	
Respondent	:	CASE NO. 1-24-bk-01078

TRUSTEE’S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 14th day of January 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor’s Plan for the following reason(s):

1. Failure to properly state the liquidation value in Section 1.B of the Plan. Trustee calculates the liquidation value at \$15,246.00.
2. Schedule A lacks description. Specifically, value conflicts with the value as stated on Schedule D.
3. The Trustee avers that Debtor’s Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid due to the liquidation value.
 - b. Plan ambiguous – total payment on vehicle is not calculated correctly in Section 2.E.

WHEREFORE, Trustee alleges and avers that Debtor’s Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of Debtor(s) Plan.
- b. Dismiss or convert Debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 14th day of January 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

MICHAEL TRAVIS, ESQUIRE
3904 TRINDLE ROAD
CAMP HILL, PA 17011

/s/Tammy Life

Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee